

Exhibit “A”

Defendants.

CIVIL ACTION NO. 2:22-cv-04614

- **Edwell Henry II** **Plaintiff**
Plaintiff has knowledge of all the claims in his Complaint.
Plaintiff resides at 706B Sedgefield Drive, Mount Laurel, New Jersey 08054. Plaintiff's direct dial phone number is 856.206.9750.
- **Dr. R. Guy Erwin** **Defendant**
This individual is identified in the civil action complaint including job title. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. This individual was involved in Plaintiff's termination. Defendants are in possession of this individual's contact information.
- **Jackie King** **Witness – Human Resources Contractor**

This individual is identified in the civil action complaint including job title. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. This individual was involved in the allegations that Plaintiff claims led to Plaintiff's termination. Defendants are in possession of this individual's contact information.

- **Rhonda Schupp** **Witness – Employee in Defendant's Payroll Dept.**
This individual is identified in the civil action complaint including job title. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Buff Carlson** **Witness – Employee – Chief Financial Officer**
This individual is identified in the civil action complaint including job title. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Human Resources Coordinator** **Witness – Employee of Defendant**
Plaintiff worked with the Human Resources Coordinator. Plaintiff cannot recall her name. Plaintiff can provide the falling characteristics to assist in identification. The Human Resources Coordinator began her employment after Plaintiff assumed the position of Director of Human Resources. Plaintiff interviewed and hired the Human Resources Coordinator. She was an African American female. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Human Resources Assistant** **Witness – Employee of Defendant**
Plaintiff worked with the Human Resources Assistant who was a contractor and paid through a 1099. Plaintiff cannot recall his name. Plaintiff can provide the falling characteristics to assist in identification. The Human Resources Assistant began his employment after Plaintiff was promoted from Director of Human Resources to Vice President of Human Resources and Diversity Equity and Inclusion. Plaintiff interviewed and hired the Human Resources Assistant. He was an African American male. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Ms. Lin Jackson** **Witness – Employee of Defendant**
This individual was a full-time employee in the office of Contextual Formation. This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Brad Kushner** **Counsel for Defendant**

This This individual has knowledge related to direct communications with Plaintiff and Plaintiff's protected activity. Defendants are in possession of this individuals contact information.

- **Theresa Zechman** **Counsel for Defendant**
This This individual has knowledge related to direct communications with Plaintiff and Plaintiff's protected activity. Defendants are in possession of this individuals contact information.
- **Dr. Wayne Croft** **Witness – Employee of Defendant**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Dr. Richard Green** **Witness – Former Employee of Defendant**
Dr., Richard Green was the Interim President of the school. This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Angela Zimmann** **Witness – Interim President after Dr. Green**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Dennis Trotter** **Witness – Vice President and Chief Operating Officer**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Christina (Trina) Trotter** **Witness – Former Vice President of Student Affairs**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Marcia L. Williams** **Witness – Former Student**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **W Rodger Randolph III - Former Student and President of the Student Body**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.
- **Dr. Quinton Robinson - Witness – Current Director of Urban Theological Institute**
This This individual has knowledge related to allegations contained in Plaintiff's civil action complaint. Defendants are in possession of this individual's contact information.

- Dr. Karyn Wiseman** **Witness – Associate Professor**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- Dr. J. Jayakiran Sabastian** **Witness – Current Dean**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- Dr. Charles Leonard** **Witness – Director of Contextual Formation**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- Dr. Tommy** **Witness – Board Member**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- Dr. Martin Zimmann - Executive Director of the Stewardship of Life Institute**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- Dr. Peter Boehringer** **Witness – Board Chair**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- Dr. Peter Boehringer** **Witness – Board Chair**

This This individual has knowledge related to allegations contained in Plaintiff’s civil action complaint. Defendants are in possession of this individual’s contact information.
- EXPERT WITNESS** **EMOTIONAL DISTRESS**

Plaintiff intends to call an expert at trial to provide testimony related to the extent of Plaintiff compensatory damages and claim for emotional distress caused by Defendant’s illegal conduct. Plaintiff will provide the curriculum vitae (“CV”) for any and all experts Plaintiff calls upon to testify at trial including the CV for the expert Plaintiff will use related to Plaintiff’s claim for emotional damages.
- EXPERT WITNESS** **EMOTIONAL DISTRESS (PHYSICAL EFFECTS)**

Plaintiff intends to call an expert at trial to provide testimony related to the extent of Plaintiff emotional damages. Plaintiff will provide the curriculum vitae (“CV”) for any and all experts Plaintiff calls upon to testify at trial including the CV for the expert Plaintiff will use related to Plaintiff’s claim for emotional damages. Plaintiff plans to call Dr. Mark Richardson who will provide testify on Plaintiff’s behalf in connection with Plaintiff’s claims for emotional distress.

- **EXPERT WITNESS EXPERT AS TO LIABILITY**

Plaintiff intends to call an expert at trial to provide testimony related to Plaintiff's claims to prove Defendant's violated Plaintiff's rights and the laws contained in Plaintiff's civil action complaint. Plaintiff will provide the curriculum vitae ("CV") for any and all experts Plaintiff calls upon to testify at trial including the CV for the expert Plaintiff intends to call upon to testify that Defendant's disregarded the applicable laws.

- **EXPERT WITNESS DAMAGES – ECONOMIC LOSSES**

Plaintiff intends to call an expert at trial to provide testimony related to Plaintiff damages claim. Plaintiff will provide the curriculum vitae ("CV") for any and all experts Plaintiff calls upon to testify at trial including the CV for the expert Plaintiff intends to call upon to testify regarding Plaintiff's economic losses.

B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

- All pleadings on file with the Court and/or exchanged between parties in this action.
- All discovery which has or will be produced by Plaintiff and Defendants in this action.
- Plaintiff's expert psychological report.
- Plaintiff's expert report regarding liability.
- Plaintiff's expert report regarding economic losses.
- Plaintiff's expert report regarding Defendants violations of state and federal laws.
- Plaintiff's expert report as to physical injuries caused by Defendants.
- Plaintiff's documentation related to the exhaustion of administrative remedies.
- Emails and text messages exchanged between Plaintiff and/or the individuals named above.
- Photographic evidence.
- Video evidence.
- Documentation of events that took place during Plaintiff's employment for Defendants.
- Plaintiff's evidence regarding mitigation of damages, job search and subsequent employment.
- All communications connected to Plaintiff's employment and the allegations in the civil action Complaint and Answer.
- Plaintiff reserves the right to supplement and/or amend this response as additional information becomes available and as may be appropriate and necessary.
- All meeting Minutes and notes from Board meetings and meetings held during Plaintiff's employment for Defendant.
- All documents related to Plaintiff's protected activity including investigation notes, communications including correspondence and electronic communications, and reports and conclusions.

- All FMLA paperwork and documents from Plaintiff's personnel file.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

AT THIS EARLY JUNCTURE, PLAINTIFF IS CLAIMING THE FOLLOWING DAMAGES:

Plaintiff has suffered damages as a result of the wrongful termination.

Past Wage Loss: \$ TBD

Future Wage Loss: \$ TBD

Compensatory Damages \$2,000,000.00.

Punitive Damages: In the event this matter proceeds to trial, Plaintiff will seek the maximum available award of punitive damages allowable the Pennsylvania Human Relations Act.

Punitive Damages: \$3,000,000.00

Plaintiff claims attorney's fees upon a successful verdict under Title VII and Pennsylvania Administrative Code.

- Plaintiff reserves the right to supplement/amend this response as more information becomes available and as may be appropriate and necessary.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgement.

N/A.

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
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DATED: March 1, 2023

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Initial Disclosures were sent to the below parties by email.

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DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
SETH D. CARSON, Esquire

DATED: March 1, 2023